

# EXHIBIT A

**EXHIBIT A: RESOLUTION STATISTICS IN MULTI-DISTRICT LITIGATIONS\***

Product Name	MDL Number	Description	Company	Claimed Injuries	Approx. Number of Settling Claimants	Overall Settlement Amount	Approx. Mean Settlement Amount Per Claimant	Example Sources
Actos	2299	Type II diabetes	Takeda & Eli Lilly	Bladder cancer	9,000	\$2.4B	\$266,667	<a href="https://www.drugwatch.com/actos/lawsuits/">https://www.drugwatch.com/actos/lawsuits/</a>
Apogee Perigee	2325	Pelvic mesh	Endo / American Medical Systems	Pain, infection, surgical removals / revisions	48,000 22,000 20,000	\$2.8B \$775M \$830M	\$58,333 \$35,227 \$41,500	<a href="https://www.drugwatch.com/news/2017/08/09/endo-announces-775m-settlement-for-transvaginal-mesh-claims/">https://www.drugwatch.com/news/2017/08/09/endo-announces-775m-settlement-for-transvaginal-mesh-claims/</a> <a href="https://www.drugwatch.com/news/2014/05/01/ams-settles-830m-vaginal-mesh-lawsuit/">https://www.drugwatch.com/news/2014/05/01/ams-settles-830m-vaginal-mesh-lawsuit/</a>
Benicar	2606	High blood pressure	Daiichi-Sanyo	Enteropathy	2,300	\$300M	\$130,435	<a href="https://www.reuters.com/article/us-daiichi-sankyo-lawsuit/daiichi-sankyo-settles-u-s-lawsuits-over-blood-pressure-drug-benicar-idUSKBN1AH4V9/">https://www.reuters.com/article/us-daiichi-sankyo-lawsuit/daiichi-sankyo-settles-u-s-lawsuits-over-blood-pressure-drug-benicar-idUSKBN1AH4V9/</a>
Chantix	2092	Anti-Smoking	Pfizer	Suicide and other psychiatric disturbances	2,160	\$273M	\$126,389	<a href="https://www.fiercepharma.com/sales-and-marketing/pfizer-settles-2-000-plus-chantix-suits-takes-273m-charge">https://www.fiercepharma.com/sales-and-marketing/pfizer-settles-2-000-plus-chantix-suits-takes-273m-charge</a>
Coloplast	2387	Pelvic mesh	Coloplast Corporation	Pain, infection, surgical removals / revisions	400	\$16M	\$40,000	<a href="https://news.bloomberglaw.com/pharma-and-life-sciences/coloplast-said-to-pay-16-million-to-settle-some-400-pelvic-mesh-cases">https://news.bloomberglaw.com/pharma-and-life-sciences/coloplast-said-to-pay-16-million-to-settle-some-400-pelvic-mesh-cases</a>
Combat Arms Earplug	2885	Earplug	3M	Hearing loss and tinnitus	250,000	\$6B	\$24,000	<a href="https://www.flnd.uscourts.gov/3m-products-liability-litigation-mdl-no-2885">https://www.flnd.uscourts.gov/3m-products-liability-litigation-mdl-no-2885</a>
Essure	2739	Contraceptive implant	Bayer	Pain, perforation, ectopic pregnancy, bleeding, surgical removals, auto immune	35,100	\$1.6B	\$45,584	<a href="https://www.reuters.com/article/business/bayer-to-pay-1-6-billion-to-resolve-u-s-claims-for-essure-birth-control-device-idUSKBN25G252/">https://www.reuters.com/article/business/bayer-to-pay-1-6-billion-to-resolve-u-s-claims-for-essure-birth-control-device-idUSKBN25G252/</a>
Fosamax	1789	Osteoporosis	Merck	Jaw and femur fractures	1,200	\$27.7M	\$23,083	<a href="https://www.drugwatch.com/fosamax/lawsuits/">https://www.drugwatch.com/fosamax/lawsuits/</a>
GranuFlo/ Naturallyte	2428	Dialysis	Fresenius Medical Care	Cardiac arrest	10,000	\$250M	\$25,000	<a href="https://www.nytimes.com/2016/02/19/business/dialysis-equipment-maker-settles-lawsuit-for-250-million.html">https://www.nytimes.com/2016/02/19/business/dialysis-equipment-maker-settles-lawsuit-for-250-million.html</a>
Kugel Mesh	1842	Hernia patch	Davol/Bard	Various painful, life-threatening, and potentially fatal complications	2,700	\$184M	\$68,148	<a href="https://www.robertkinglawfirm.com/personal-injury/hernia-mesh-lawsuit/">https://www.robertkinglawfirm.com/personal-injury/hernia-mesh-lawsuit/</a>
Mirena	2767	Contraceptive hormone releasing IUD	Bayer	Perforations	4,600	\$12.2M	\$2,652	<a href="https://today.westlaw.com/Document/Ied28b040399111ebb3c1929a5b9ad316/View/FullText.html?transitionType=Default&amp;contextData=(sc.Default)&amp;firstPage=true">https://today.westlaw.com/Document/Ied28b040399111ebb3c1929a5b9ad316/View/FullText.html?transitionType=Default&amp;contextData=(sc.Default)&amp;firstPage=true</a>
Nexium Prilosec	2404	Proton-pump inhibitor (PPI); treats heart burn / stomach acid	AstraZeneca	Kidney injuries	11,000	\$425M	\$38,636	<a href="https://www.reuters.com/legal/astrazeneca-pay-425-mln-settle-nexium-prilosec-litigation-us-2023-10-03/">https://www.reuters.com/legal/astrazeneca-pay-425-mln-settle-nexium-prilosec-litigation-us-2023-10-03/</a>
Nuvaring	1964	Contraceptive	Merck	Strokes, heart attacks, blood clots	3,610	\$100M	\$27,700	<a href="https://www.law360.com/articles/507908/merck-to-pay-100m-to-end-nuvaring-blood-clot-suits">https://www.law360.com/articles/507908/merck-to-pay-100m-to-end-nuvaring-blood-clot-suits</a>
Pradaxa	2385	Blood thinner	Boehringer Ingelheim	Bleeds / strokes	4,100	\$650M	\$158,537	<a href="https://www.drugwatch.com/pradaxa/lawsuits/">https://www.drugwatch.com/pradaxa/lawsuits/</a>
Prempro	1507	Hormone replacement therapy (HRT)	Wyeth / Pfizer	Breast cancer	6,000 4,000	\$896M \$330M	\$149,333 \$82,500	<a href="https://www.aboutlawsuits.com/prempro-settlement-payments-breast-cancer-29138/">https://www.aboutlawsuits.com/prempro-settlement-payments-breast-cancer-29138/</a>
Propecia	2331	Male pattern hair loss	Merck	Erectile dysfunction	562	\$4.3M	\$7,651	<a href="https://www.drugwatch.com/propecia/lawsuits/">https://www.drugwatch.com/propecia/lawsuits/</a>
Seroquel	1769	Antipsychotic	AstraZeneca	Diabetes	6,000 17,500	\$150M \$200M	\$25,000 \$11,429	<a href="https://www.aboutlawsuits.com/seroquel-settlement-16354/">https://www.aboutlawsuits.com/seroquel-settlement-16354/</a>
Vioxx	1657	Painkiller	Merck	Cardiac arrest and stroke	60,000	\$4.85B	\$80,833	<a href="https://www.drugwatch.com/vioxx/lawsuits/">https://www.drugwatch.com/vioxx/lawsuits/</a>

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Wright Medical	2329	Hip Implant	Wright Medical	Metallosis and tissue and bone damage	1,292 600	\$240M \$90M	\$185,759 \$150,000	<a href="https://www.drugwatch.com/hip-replacement/wright-medical/">https://www.drugwatch.com/hip-replacement/wright-medical/</a>
Xarelto	2592	Blood thinner	Bayer & J&J	Bleeds / strokes	25,000	\$775M	\$31,000	<a href="https://www.reuters.com/article/business/bayer-jj-settle-thousands-of-us-xarelto-lawsuits-for-775-million-idUSKCN1R61UD/">https://www.reuters.com/article/business/bayer-jj-settle-thousands-of-us-xarelto-lawsuits-for-775-million-idUSKCN1R61UD/</a>
Yaz Yasmin	2100	Contraceptive medicine	Bayer	Blood clots, strokes, gallbladder problems	10,300 1,200 7,200	\$2.04B (blood clots) \$56.9M (heart attack / stroke) \$21.5M (gallbladder)	\$198,058 \$47,417 \$2,986	<a href="https://www.drugwatch.com/yaz/settlements/">https://www.drugwatch.com/yaz/settlements/</a>
Zantac	2924	Heartburn medicine	GSK	Cancer	80,000	\$2.2B	\$27,500	<a href="https://www.gsk.com/en-gb/media/press-releases/statement-zantac-ranitidine-litigation-settlement-agreements-reached/">https://www.gsk.com/en-gb/media/press-releases/statement-zantac-ranitidine-litigation-settlement-agreements-reached/</a>

\*This chart includes resolution statistics for the listed products from both within and outside of the listed MDLs.